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March 21, 2023

Via Electronic Filing

The Honorable Vera M. Scanlon, U.S.M.J.
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
1214 South Brooklyn, New York 11201

Re: *Jacques v. Livonia Express Grocery Inc. et al*
Case No.: 1:22-cv-02228-CBA-VMS

Dear Honorable Magistrate Judge Scanlon:

This law firm represents Plaintiff Aramus Jacques (the “Plaintiff”) in the above-referenced matter.

Pursuant to the directives contained in Your Honor’s December 6, 2022 Scheduling Order, this letter respectfully serves to provide the Court with a status update in the above-referenced action.

Plaintiff filed an amended complaint on December 21, 2022 (the “Amended Complaint”) [Dckt. No. 21].

As of the date of this filing, Defendants have not filed an answer to the Amended Complaint. Pursuant to Federal Rule of Civil Procedure (“Fed.R.Civ.P.”) 12(a)(1)(A), Defendants’ time to answer expired on January 11, 2023.

Via email circulated on March 21, 2023 at 3:59 p.m., Defendants’ counsel requested an extension of time to file an answer to the Amended Complaint to, through and including, March 28, 2023. Plaintiff consents to this request. Thus, the instant letter further serves to formalize Defendant’s request, in writing, to the Court.

The parties anticipate being able to conclude fact discovery by the existing May 31, 2023 completion deadline. [See 12/6/2022 Scheduling Order].

Thank you, in advance, for your time and consideration.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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VIA ECF: All Counsel